

Application No. 10/567,050

PU030191

REMARKS

Reconsideration of this application is respectfully requested. Claims 1-25 are in this application and are presented for the Examiner's consideration in view of the following comments.

Claims 1-6, 8, 17, 19, 21 and 22 have been rejected under 35 U.S.C. §103(a) as being anticipated by U.S. Patent No. 6,697,534, issued February 24, 2004 to Tan et al. (*Tan*) in view of U.S. Patent No. 7,027,659 issued April 11, 2006 to Thomas (*Thomas*). Applicant respectfully disagrees.

Respectfully, the Examiner's characterization of *Thomas* is wrong. Thus, the combination of *Tan* and *Thomas* does not yield Applicant's claimed invention. The Examiner points to col. 9, lns. 50-65 of *Thomas* as describing Applicant's claim 1 requirement of "displaying where the filtering is being performed on the received image data". This is not correct. This portion of *Thomas* states:

The quantization module 618 is further connected to coding module 620, which receives the quantized video data and encodes each block of pixels (Block 822).

The pre-processing module 622 receives the encoded video data from the coding module 620 and eliminates the randomly generated noise (block 824) that may cause single pixel errors originating from the video camera 412. Subsequent compression of this noise will increase the data transmission requirements of the system 600 and waste data bandwidth of the transmission medium. Although simple low pass filtering can reduce the noise, it generally results in blurring of the resulting video image. Therefore, more complex filtering techniques are used (linear or non-linear filtering) in order that the noise generated by the video camera 412 is reduced, while preserving the resolution of the resulting display video image.

Thomas, col. 9, lns. 50-65, emphasis added.

As can be observed from the above text, nowhere does *Thomas* describe "displaying" anything – let alone Applicant's claim 1 requirement of "displaying where the filtering is being performed on the received image data". All that this portion of *Thomas* describes is that encoded video data is filtered to remove randomly generated noise. Indeed, this portion of *Thomas* is referring to pre-processing before transmission. *Thomas*, col. 9, ln. 67 to col. 10, ln. 7. Further. Applicant notes that there are only

Application No. 10/567,050

PU030191

EIGHT variations of the word "filter" in the entire text of *Thomas* – and none of these portions of *Thomas* describe Applicant's claim 1 requirement of "displaying where the filtering is being performed on the received image data". (*Thomas*, col. 8, lns. 16, 22; col. 9, lns. 60, 62, 63; and col. 10, lns. 23, 24 and 42.) Thus, Applicant respectfully submits that nowhere does *Thomas* describe, or suggest, Applicant's claim 1 requirement of "displaying where the filtering is being performed on the received image data".

In fact, *Thomas* describes an apparatus for generating video images that are perceived to be three-dimensional to alleviate eye strain and fatigue. *Thomas*, col. 2, lns. 51-55. This type of application simply does not display "where the filtering is being performed on the received image data" as required by Applicant's claim 1. Why would you display where the filtering is being performed on the displayed image if you are attempting to generate a three-dimensional image to alleviate eye strain and fatigue?

In view of the above, the Examiner's statement that it would be obvious to modify *Tan* with *Thomas* because it leads to a reduction in the amount of data may be true, but that is because, as noted above, *Thomas* describes filtering the video to remove noise – not displaying "where the filtering is being performed on the received image data" as required by Applicant's claim 1.

Similar requirements are found in Applicant's independent claims 8 and 25.

Likewise, nowhere does *Thomas*, or *Tan* describe, or suggest, singly or in combination, "converting the at least one filter control signal to a video signal" as required by Applicant's independent claim 17. Similar requirements are found in Applicant's independent claims 19, 21 and 22.

In view of the above, Applicant respectfully submits that the rejection of independent claims 1, 8, 17, 19, 21, 22 and 25 under 35 U.S.C. §103(a) has been traversed. Consequently, dependent claims 2-6, are also patentable over *Tan* in view of *Thomas*.

Claims 7, 9-16, 18, 20, 23 and 24 have been rejected under 35 U.S.C. §103(a) as being unpatentable over *Tan* in view of *Thomas* and further in view of U.S. Patent

Application No. 10/567,050

PU030191

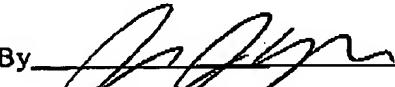
No. 5,949,916 issued September 7, 1999 to Chun. Applicant respectfully traverses for the reasons described above with respect to the independent claims.

As it is believed that all of the rejections set forth in the Official Action have been fully met, favorable reconsideration and allowance are earnestly solicited. If, however, for any reason the Examiner does not believe that such action can be taken at this time, it is respectfully requested that the Examiner telephone Applicant's attorney in order to overcome any additional objections that the Examiner might have.

If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 07-0832 therefor.

Respectfully submitted,

Todd Martin Beazley

By 
Joseph J. Spalach
Registration No.: 36,229
(609) 734-6839

Patent Operations
Thomson Licensing LLC.
P.O. Box 5312
Princeton, New Jersey 08543-5312
March 15, 2007

Application No. 10/567,050

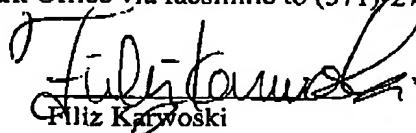
PU030191

CERTIFICATE OF MAILING

I hereby certify that the foregoing Response to Office Action is being deposited in the United States Patent and Trademark Office via facsimile to (571) 273-8300 on March 15, 2007.

March 15, 2007

Date


Filiz Karyoski